

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
District of Colorado

United States of America )

v. )

1. MICHAEL ALAN KINCADE, )  
2. CHRISTOPHER LEE RICHARDSON )

*Defendant*

Case No.

09-mj-1153-MJW

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 06/24/2009 in the county of Denver in the \_\_\_\_\_ District of  
Colorado, the defendant violated 18 U. S. C. § 2113(a) and 2  
, an offense described as follows:

See Attachment A attached hereto and herein incorporated by reference

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference

☒ Continued on the attached sheet.

Ricky V. Wright  
*Complainant's signature*  
Ricky V. Wright, SA/FBI  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: August 28, 2009  
At 5:05 P.M.  
City and state: Denver, Colorado

Michael J. Watanabe  
*Judge's signature*  
MICHAEL J. WATANABE  
U.S. MAGISTRATE JUDGE  
*Printed name and title*  
DISTRICT OF COLORADO

**ATTACHMENT A**

**COUNT 1**

On or about June 24, 2009, 2009, in the State and District of Colorado, MICHAEL ALAN KINCADE and CHRISTOPHER LEE RICHARDSON, defendants herein, did knowingly, by force and violence, and by intimidation, take and attempt to take from the person and presence of another, to wit: a person whose initials are A.G. and others, money and property belonging to and in the care, custody, control, management and possession of Community Banks of Colorado located at 277 Broadway, Denver, Colorado; and further MICHAEL ALAN KINCADE and CHRISTOPHER LEE RICHARDSON, did aid, abet, counsel, command, induce and procure each others' participation in the commission of said offense; and further, at all times relevant herein, the monies and deposits of Community Banks of Colorado were insured by the Federal Deposit Insurance Corporation, an agency of the United States government.

The conduct described above was in violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT 2**

On or about August 7, 2009, 2009, in the State and District of Colorado, MICHAEL ALAN KINCADE and CHRISTOPHER LEE RICHARDSON, defendants herein, did knowingly, by force and violence, and by intimidation, take and attempt to take from the person and presence of another, to wit: a person whose initials are J.G. and others, money and property belonging to and in the care, custody, control, management and possession of Wells Fargo Bank located at 3900 Wadsworth Boulevard, Wheat Ridge, Colorado; and further MICHAEL ALAN KINCADE and CHRISTOPHER LEE RICHARDSON, did aid, abet, counsel, command, induce

and procure each others' participation in the commission of said offense; and further, at all times relevant herein, the monies and deposits of Wells Fargo Bank were insured by the Federal Deposit Insurance Corporation, an agency of the United States government.

The conduct described above was in violation of Title 18, United States Code, Sections 2113(a) and 2.

AFFIDAVIT

I, Ricky V. Wright, being duly sworn, hereby depose and say:

Your affiant is a Special Agent for the Federal Bureau of Investigation (FBI). Your affiant is therefore an investigative or law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code, and is authorized by law to conduct investigations of and make arrests for offenses enumerated in Title 18, United States Code, Section 2516. Your affiant has been a Special Agent with the Federal Bureau of Investigation for 12 years and is currently assigned to the FBI's Denver Field Office, Rocky Mountain Safe Streets Task Force, in Denver, Colorado. Your affiant has the duty to investigate violations of Title 18, United States Code, Section 2113(a), Bank Robbery.

The information contained in this affidavit was either observed by your affiant, or related to the affiant by fellow law enforcement officers, or found by the affiant from law enforcement investigative files or other databases.

On June 24, 2009, at approximately 11:50 a.m., Community Banks of Colorado, 277 Broadway, Unit C, Denver, Colorado, the monies and deposits of which are insured by the Federal Deposit Insurance Corporation, was robbed by a lone male robber. The robber walked into the Community Banks of Colorado and approached the victim teller, who's initials are "A.G.", and verbally demanded that he give him all of his money. The victim teller hesitated, but then reached into his top drawer and removed the cash. Included in the cash were the bait bills. The robber took the cash with his left hand and put it into the backpack he was carrying. He then ran out of the back door on the north side of the bank. The robber was seen by a witness running from the bank. The robber ran to an older model four-door sedan that was white in color, got into the passenger seat, and the vehicle drove west on 3<sup>rd</sup> Avenue, and turned south approximately three blocks west of Broadway. The witness described the driver of the white sedan as an Hispanic Male, in his 40s.

A surveillance video was obtained from the 7-Eleven, located at 303 Broadway, Denver, Colorado. The surveillance video showed the parking lot of the 7-Eleven, and captured the robber getting into the back passenger seat of a white sedan as the vehicle was driving out of the 7-Eleven parking lot. A review of the surveillance video by your affiant determined that the vehicle was an early or mid-1990's Buick Century.

Surveillance cameras captured good quality video of the robber during the robbery. Still images of the robber were later reviewed by your affiant.

On August 7, 2009, at approximately 1:47 p.m., Wells Fargo Bank, 3900 Wadsworth Boulevard, Denver, Colorado, the monies and deposits of which are insured by the Federal Deposit Insurance Corporation, was robbed by a lone male robber. The robber walked up to the Wells Fargo Bank, located inside of a King Sooper's store, and approached the victim teller, who's initials are "J.G.," at the teller's window. He placed a dark colored zippered bag or

backpack on the counter and said, "Give me all your money." The victim teller responded, "What?", and the robber responded, "Give me all your cash." The teller removed cash from the teller drawer and gave it to the bank robber who took his hands out of the zippered bag, took the cash, placed it in the bag and fled the bank. The loss to the bank was \$1,661.00. The robber was described as a white male, 30 to 40 years old, 5'8", thin build, dark colored sunglasses, carrying a dark colored bag.

Surveillance cameras captured fair quality video of the robber during the robbery. Still images of the robber were later reviewed by your affiant. Your affiant believes that both the Community Banks of Colorado and the Wells Fargo Bank were robbed by the same robber, based on the descriptions of the robber, his clothing, and the similar nature of the robberies.

A witness, Tom Spaeth, saw the robber of the Wells Fargo Bank run past him just outside the King Soopers. Spaeth saw the robber get in the passenger side of a dark red Ford Bronco II. The vehicle then drove south out of the King Soopers parking lot. Your affiant obtained exterior surveillance video from the King Soopers gas pumps located on the west side of the King Soopers parking lot. Your affiant reviewed the video and identified a dark red Ford Bronco II driving through the parking lot shortly before the robbery. The vehicle appeared to park in the vicinity of where Spaeth saw the getaway vehicle used by the robber. Your affiant showed a still photo of the vehicle to Spaeth and he indicated that it looked like the same vehicle used by the robber.

During the period of June 24, 2009 to August 25, 2009, a total of 14 banks were robbed in the Denver, Colorado area by the same robber. The same robber also robbed three banks in Albuquerque, New Mexico, Flagstaff, Arizona, and Hutchinson, Kansas.

The robber was described as a white male, between 5'6" to 5'11" tall, 150 to 160 pounds, with a long reddish-blond goatee, pockmarks on his face, and long hair tucked under his ball cap. The robber always demanded money verbally, and carried a backpack, which he typically placed in front of him on the counter. During the robberies the robber wore the following clothing:

A gray t-shirt, a long sleeved green shirt, blue and black backpack/duffel bag, a gray, white, and green camouflage baseball hat, a dark baseball hat, a gray or green t-shirt with an "Army" logo, and sunglasses.

For ease of reference, the robber was dubbed the "Shaggy" Bandit by investigators. Information regarding the "Shaggy" Bandit bank robber was distributed to law enforcement agencies in the Denver, Colorado area, including photographs of the white Buick Century and red Ford Bronco II used in the robberies mentioned above. Photographs of the "Shaggy" Bandit were also released to media outlets for public release.

The following is a list of banks, the monies and deposits of which are insured by the Federal Deposit Insurance Corporation, and the dates of the bank robbery which your affiant believes were robbed by the Shaggy Bandit bank robber, based on the descriptions of the robber,

his clothing, and the similar nature of the robberies:

Community Banks of Colorado  
277 Broadway  
Denver, Colorado  
June 24, 2009;

Vectra Bank  
401 East Speer Boulevard  
Denver, Colorado  
June 25, 2009;

Advantage Bank  
1611 Canyon Boulevard  
Boulder, Colorado  
June 26, 2009;

Wells Fargo Bank  
1050 Ken Pratt Boulevard  
Longmont, Colorado  
June 26, 2009;

Wells Fargo Bank  
1800 Eubank Boulevard  
Albuquerque, New Mexico  
June 30, 2009;

Wells Fargo Bank  
201 North Switzer Canyon  
Flagstaff, Arizona  
July 8, 2009;

Peoples Bank and Trust  
1020 North Main  
Hutchinson, Kansas  
July 14, 2009;

First Bank  
6350 Sheridan Boulevard  
Arvada, Colorado  
July 17, 2009;

CoreFirst Bank and Trust  
6220 East 14th Avenue  
Denver, Colorado  
July 21, 2009;

First Bank  
17000 East Iliff Avenue  
Aurora, Colorado  
July 21, 2009

Vectra Bank  
401 East Speer Boulevard  
Denver, Colorado  
July 29, 2009

First Bank  
6350 North Sheridan Blvd.  
Arvada, Colorado  
July 29, 2009

Wells Fargo Bank  
3900 Wadsworth Boulevard  
Wheat Ridge, Colorado  
August 7, 2009

First Bank  
4271 South Buckley Road  
Aurora, Colorado  
August 18, 2009

First Bank  
1650 30th Street  
Boulder, Colorado  
August 20, 2009;

TCF Bank  
7203 West 55th Avenue  
Arvada, Colorado  
August 24, 2009;

U.S. Bank  
6412 South Parker Road  
Aurora, Colorado  
August 25, 2009

On August 27, 2009 at approximately 1:44 p.m, the Boulder, Colorado Police Department went to the First Tier Bank, located at 2120 Broadway, Boulder, Colorado, in reference to a possible sighting of the "Shaggy" Bandit bank robber. Detectives determined that a witness at the bank had confirmed the Shaggy Bandit had just come into the bank at 1:32 p.m. When the suspect went into the bank, there were no tellers available and the suspect left. The

suspect was wearing a plaid shirt, black “wrap around” sunglasses, and worn medium blue colored jeans with frayed cuffs.

Shortly after the suspect left the bank, Boulder, Colorado Police Officer J. Duffy located a maroon Ford Bronco II that matched the description of the suspected bank robbery vehicle. The license plate on the vehicle was 235RGR, which listed to a Honda Civic. The plate had been reported stolen out of Sheridan, Colorado. This vehicle was traveling from Boulder to Longmont on Highway 119. Officer Duffy followed the vehicle into the parking lot of Red Lobster, located 2177 Ken Pratt Boulevard, Longmont, Colorado. Officer Duffy and state troopers initiated a traffic stop and found the driver, Christopher Lee Richardson, age 45, had a revoked driver’s license. The passenger in the vehicle, Michael Alan Kincade, age 29, looked very similar to the Shaggy Bandit including having a red colored beard, pock marked face, and blue jeans with tattered cuffs. The VIN number on this vehicle is 1FMCU14T2GUC43352. This VIN number is registered to a red 1986 Ford Bronco, and was last registered to Gaspar Duran, 7290 Ruth Way in Denver, Colorado, but the registration had expired in August 2008.

After the stop, investigators were able to observe through the open passenger door, a plaid shirt, sunglasses and baseball hat, situated behind the driver’s seat. The clothing looked similar to the clothing worn by the robber at First Bank, 1650 30<sup>th</sup> Street, Boulder, Colorado, on August 20, 2009. During that robbery, surveillance video captured video of the back end of a maroon Ford Bronco leaving the scene.

Christopher Lee Richardson and Michael Alan Kincade were taken into custody and transported to the Longmont Police Department.

On August 27, 2009, while at the Longmont Police Department, Kincade was advised of his Miranda rights by your affiant and Federal Task Force Officer(TFO) Eric Perry. Kincade agreed to waive his rights and speak to your affiant and TFO Perry. Kincade admitted that he and Richardson had participated in a total of over twenty bank robberies in Colorado, New Mexico, Arizona, Nevada, Utah, and Kansas. Several of these robberies were previously unconnected to the Shaggy Bandit, including two robberies in Nevada, at least one in Utah, and additional robberies in New Mexico and Kansas.

Kincade advised that he met Richardson in June 2009 while Kincade was living in a shelter at 2323 Curtis Street, Denver, Colorado. Richardson offered Kincade a “job.” Kincade was interested, because he was out of work; however, Kincade later learned that Richardson wanted Kincade to help Richardson rob banks. Richardson instructed Kincade how to rob the banks, helped choose what clothing to wear, and told Kincade what to say to the victim tellers. Kincade agreed to act as the robber, while Richardson drove the getaway vehicle during each of the robberies they did. They first started robbing banks in the Denver area in late June 2009. Kincade could not recall the names of most of the banks he robbed, but was able to identify himself from bank surveillance photographs shown to him by your affiant and TFO Perry. After reviewing photographs, Kincade positively identified himself as the robber in the following bank robberies, in which he indicated Richardson acted as the getaway driver:



Community Banks of Colorado  
277 Broadway  
Denver, Colorado  
June 24, 2009;

Vectra Bank  
401 East Speer Boulevard  
Denver, Colorado  
June 25, 2009;

Advantage Bank  
1611 Canyon Boulevard  
Boulder, Colorado  
June 26, 2009;

Wells Fargo Bank  
1050 Ken Pratt Boulevard  
Longmont, Colorado  
June 26, 2009;

Wells Fargo Bank  
201 North Switzer Canyon  
Flagstaff, Arizona  
July 8, 2009;

Peoples Bank and Trust  
1020 North Main  
Hutchinson, Kansas  
July 14, 2009;

First Bank  
6350 Sheridan Boulevard  
Arvada, Colorado  
July 17, 2009;

CoreFirst Bank and Trust  
6220 East 14th Avenue  
Denver, Colorado  
July 21, 2009;

First Bank  
17000 East Iliff Avenue  
Aurora, Colorado  
July 21, 2009

Vectra Bank  
401 East Speer Boulevard  
Denver, Colorado  
July 29, 2009

First Bank  
6350 North Sheridan Blvd.  
Arvada, Colorado  
July 29, 2009

Wells Fargo Bank  
3900 Wadsworth Boulevard  
Wheat Ridge, Colorado  
August 7, 2009

First Bank  
4271 South Buckley Road  
Aurora, Colorado  
August 18, 2009

First Bank  
1650 30th Street  
Boulder, Colorado  
August 20, 2009;

TCF Bank  
7203 West 55th Avenue  
Arvada, Colorado  
August 24, 2009;

U.S. Bank  
6412 South Parker Road  
Aurora, Colorado  
August 25, 2009

During the interview with your affiant, Kincade advised that he has been living with Richardson at a trailer on Hwy 2, in Commerce City, Colorado. The trailer is on lot 25. The trailer belonged to Richardson's uncle, who recently died.

During the interview with your affiant, Kincade advised he and Richardson used three vehicles to rob the banks. The first vehicle was a white Buick Century that belonged to Richardson's uncle. This vehicle was impounded by police at the Denver Veteran's Hospital because of misuse of plates. This vehicle has a VIN of 3G4AG54N8NS605270. Kincade was shown a photograph of the Buick Century taken from the 7-Eleven surveillance video from the robbery of Community Banks of Colorado on June 24, 2009. Kincade identified the Buick

Century in the surveillance video as the vehicle used by Richardson and Kincade to rob that bank.

On August 28, 2009, TFO Eric Perry obtained police reports from the Veteran's Hospital Police that documented the impounding of the Buick Century on August 4, 2009. The Buick was towed by Twenty First Century Recovery and stored in their lot F which is located at 2100 West Stanford Place, Sheridan, Colorado. TFO Perry contacted the owner of Twenty First Century Recovery and learned that the vehicle is currently still located there and has been there since it was towed on August 4, 2009. Colorado Division of Motor Vehicle records show that Leah Gallegos; an associate of Porter J. Richardson was the last registered owner for the vehicle. Porter Richardson is the uncle of Christopher Richardson.

Kincade further advised that he and Richardson also used another vehicle to rob banks, a dark green Mazda 626. In July 2009, Kincade and Richardson drove this vehicle on a road trip and traveled through New Mexico, Arizona, Nevada, Utah, and Kansas. Kincade admitted that he and Richardson robbed banks in each state using this vehicle. On July 25, 2009, Richardson and Kincade were contacted at 13th and Sante Fe Drive, Denver, Colorado by the Denver Police Department in the Mazda 626. Kincade was ultimately arrested for a curfew violation. During this contact, Officer Jose Hurtado towed the Mazda 626. On August 28, 2009, your affiant learned that a 1994 Dark Green Mazda 626, VIN: 1YVGE22D8R5128458, towed by Officer Hurtado, is still being held at the Denver Sheriff's Department impound yard, 5160 York Street, Denver, Colorado.

Kincade advised your affiant and TFO Perry that he and Richardson used a red Ford Bronco II to rob banks after the Mazda 626 was impounded. Richardson drove this vehicle in the robberies that Kincade did. This is also the same vehicle stopped by the Boulder Police Department on August 27, 2009.

On August 27, 2009, the Longmont Police Department obtained a search warrant for the 1986 Ford Bronco II, VIN: 1FMCU14T2GUC43352, in which Michael Kincade and Christopher Richardson were stopped at 2177 Ken Pratt Boulevard, Longmont, Colorado. The vehicle was towed to the Longmont Police Department where the search warrant was executed. The following items related to the bank robberies were recovered during the execution of the warrant:

1. A Colorado Stolen license plate 235-RGR.
2. A "Cricket" cellular phone, silver in color.
3. A Samsung Cricket cellular phone.
4. One plaid shirt. A visual inspection of this shirt, shows that it matches in color and design the shirt worn by the robber in several of the robberies listed above.
5. One baseball cap with the emblem "DC" on the front. A visual inspection of this cap, shows that it matches in color and design the cap worn by the robber in several of the robberies listed above.
6. A Comcast bill, dated August 27, 2009, in the name of Jacob Valdez, signed by Christopher Richardson, account number 8497101680768932. Additionally, incident to

the arrest of Christopher Richardson and found on his person was a Comcast bill with the same account number, in the name of Jacob Valdez, listing the address of 6900 Hwy 2, Lot #25, Commerce City, Colorado.

7. One backpack. A visual inspection of this backpack, shows that it matches in color and design the backpack used by the robber in several of the robberies listed above.
8. One City of Denver traffic ticket in the name Chris Richardson, dated July 25, 2009, using address 7114 East 74<sup>th</sup> Place, Commerce City, Colorado. This ticket listed the vehicle that Richardson was driving as a Mazda, with Colorado License 120-PSH, registered to a Jeff Torres.
9. One EZ Pawn receipt, dated August 19, 2009, in the name of Michael Allen Kincade, with the address of 2000 Wadsworth #131, Denver, Colorado 80219, telephone number (720)292-6799.
10. One EZ Pawn receipt, dated August 25, 2009, in the name of Christopher Richardson.
11. One vehicle registration, to a Ford Bronco, Colorado license 272-PGF, in the name of Gasper Duran.
12. One letter envelope addressed to Christopher Richardson at 6900 Hwy 2, Lot #25, Commerce City, Colorado from Donna Barnes, address P.O. Box 605, Rapid City, South Dakota, dated August 20, 2009.
13. One Discount Tire receipt, dated August 20, 2009, in the name of Chris Richardson, listing the address of 6900 Hwy 2 Commerce City, Colorado, telephone (303)219-6050 and (720)621-8111.
14. Bill of Sale of the 1986 Ford Bronco, dated April 7, 2008, showing the sale of the vehicle from Gasper Duran to Donna and Dwight A. Barnes, address 2485 Grape Vine Road, Idledak, Colorado 80453.
15. A "Just Brakes" receipt, dated August 20, 2009, signed by Christopher Richardson, with the address 6900 Hwy 2, Commerce City, telephone (720)621-8111.
16. A "NetSpend" Card, in the name of Christopher Richardson, address 6900 Hwy 2, lot 25, Commerce City, Colorado, effective date October 1, 2009.
17. A "Hernandez Tire" receipt, store location listed as 16<sup>th</sup> Street and Washington Street in Phoenix, Arizona, dated July 9, 2009, in the name of Christopher Richardson with the address of 5858 Newport Street, Commerce City, Colorado, and using telephone number (720)292-6799.
18. A Cellular 21 store receipt, dated August 18, 2009, which sells Cricket cellular phones showing the purchase of a phone in the name of Michael Kincade, who listed the address of 5858 Newport Street, Commerce City, Colorado. Kincade listed his telephone number as (720)690-3429.
19. Cricket Store receipt, showing the purchase of a phone with the telephone number (720)690-3429, and the account number 330199369478.

On August 27, 2009, Mickey McKenna, manager for the mobile home park Morning Side Trailer Park, located at 6900 Hwy 2, Commerce City, Colorado, was contacted reference the occupants of lot 25. McKenna stated that Porter Richardson, used to live in the trailer on lot 25, and had recently passed away. He believed that his nephew, whom he knew as Chris (LNU),

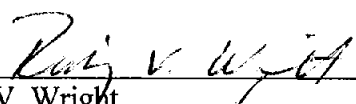
lived there now. He would receive rent checks from Chris in the form of a money order, obtained by Chris at the King Soopers nearby.

McKenna was shown a photo of Christopher Lee Richardson, age 45, wherein he stated that was the same individual whom he knew as Chris and who lived in the trailer at lot 25. McKenna was shown a photo of Michael Alan Kincade, age 29, wherein he stated that he did not know Kincade's name, but that he also lived at the trailer in lot 25 with Richardson. The trailer is located at 6900 Hwy 2, Lot 25, Commerce City, Colorado, and is a 1978 Model Holiday Rambler Presidential 3000 5<sup>th</sup> Wheel, white with teal body trim with a Colorado registration of A112814 and a Recreation Vehicle Industry Association number of 2248375. Also on the premises is a Steel Bi-Fold Locker, detached on the property but padlocked and a detached, but on the property shed made of wood. peach and white in color, which is padlocked.


When asked what vehicles Richardson and/or Kincade drove, McKenna stated that they drove a red Bronco II, and that the vehicle was normally parked in front of their trailer on lot 25. McKenna was shown a photo of the red Bronco II used in several bank robberies associated with this case, wherein McKenna stated that the vehicle in the photo appeared to be the same one that was normally parked in front of lot 25. When asked if he had seen any other vehicles, he stated that Chris used to drive his Uncle Porter Richardson's white four door car. He stated that he has not seen the white car in the last few weeks, only the red Bronco II.

Based on your affiant's training and experience in bank robbery investigations and his knowledge of the investigation set forth in this affidavit he expects to find the following items as detailed in attachment B: U.S. Currency, dye stained U.S. Currency, bank currency wrappers, pamphlets, maps or documentation of banking operations, vault, safe or other devices used to store U.S. Currency, receipts, financial statements or banking transaction documentation from the dates of June 1st, 2009 to present, documentation pertaining to the discussion, planning or execution of any bank robberies to include cell phones and computers, accessories and items of clothing to be seized: Gray t-shirt, long sleeve green shirt, blue and black backpack/duffel bag, grey, white, and green Camouflage baseball hat, and a gray or green t-shirt with "Army" logo, indicia of control of the premises to include records that establish the persons who have control, possession, custody or dominion over the property and vehicles searched and from which evidence is seized, such as: personal mail, checkbooks, personal identification, notes, other correspondence, utility bills, rent receipts, payment receipts, financial documents, keys, photographs (developed or undeveloped), leases, mortgage bills, and vehicle registration information.

I, Ricky V. Wright, being duly sworn according to law, depose and say that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Ricky V. Wright  
Special Agent, FBI

Sworn to and subscribed before me this 28<sup>th</sup> day of August, 2009. *At 5:05 P.m.*

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF COLORADO  
**MICHAEL J. WATANABE**  
U.S. MAGISTRATE JUDGE  
DISTRICT OF COLORADO

DATE: August 28, 2009

DEFENDANT: MICHAEL ALAN KINCADE

AGE: 1980

ADDRESS: In Custody

OFFENSE: **COUNTS 1 and 2:** Title 18, United States Code, Section 2113(a)  
and 2  
Bank Robbery and Aiding and Abetting

LOCATION OF OFFENSE: Denver and Jefferson County, Colorado

PENALTY: **COUNT 1:**  
NMT 20 years imprisonment; NMT \$250,000.00 fine, or both; NMT  
3 years supervised release; \$100.00 Special Assessment; Restitution  
of at least \$807.00

**COUNT 2:**  
NMT 20 years imprisonment; NMT \$250,000.00 fine, or both; NMT  
3 years supervised release; \$100.00 Special Assessment; Restitution  
of at least \$1,661.00

AGENT: RICKY V. WRIGHT  
Special Agent - FBI

AUTHORIZED BY: DAVID M. CONNER  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X  five days or less

over five days

other

THE GOVERNMENT

  X   will seek detention in this case

       will not seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. (**Circle one**)

OCDETF CASE:            Yes                      X                      No



DATE: August 28, 2009

DEFENDANT: CHRISTOPHER LEE RICHARDSON

AGE: 1964

ADDRESS: In Custody

OFFENSE: **COUNTS 1 and 2:** Title 18, United States Code, Sections 2113(a)  
and 2  
Bank Robbery and Aiding and Abetting

LOCATION OF OFFENSE: Denver and Jefferson County, Colorado

PENALTY: **COUNT 1:**  
NMT 20 years imprisonment; NMT \$250,000.00 fine, or both; NMT  
3 years supervised release; \$100.00 Special Assessment; Restitution  
of at least \$807.00

**COUNT 2:**  
NMT 20 years imprisonment; NMT \$250,000.00 fine, or both; NMT  
3 years supervised release; \$100.00 Special Assessment; Restitution  
of at least \$1,661.00

AGENT: RICKY V. WRIGHT  
Special Agent - FBI

AUTHORIZED BY: DAVID M. CONNER  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X  five days or less

over five days

other

THE GOVERNMENT

  X   will seek detention in this case

       will not seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE:           Yes                      X                      No